SF 4.1
AR 4.1

IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

224 South Arthur, Pocatello, ID 83204-3202, (208) 236-6160

Philip E. Batt, Governor

July 7, 1995

Tim Brincefield
US EPA Region 10
HW-113
1200 Sixth Ave.
Seattle, Wa. 98101

Regarding: State of Idaho comments on the Monsanto Development and Screening of Remedial Alternatives Memorandum.

Dear Mr. Brincefield:

Enclosed are the comments from the State of Idaho on the Monsanto Development and Screening of Remedial Alternatives Memorandum. We look forward to being able to meet with you and Monsanto representatives to discuss some of our concerns.

I regret that the schedule imposes a difficulty in giving you time to respond with questions. If you should have questions, I will be pleased to answer them, or set in motion the processes to obtain answers, when we meet.

Regards

Gordon Brown

Gordon Brown
Remediation Project Officer

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enc: State of Idaho Comments on the Development and Screening of Remedial Alternatives Memorandum

cc: Boyd Roberts
Mike Thomas
Curt Fransen
George Spinner

State of Idaho Comments on the Monsanto Development and Screening of Remedial Alternatives Memorandum

Prepared by Gordon Brown on July 7, 1995

Specific Comments:

On page 1 of the Executive Summary, second paragraph from the end, the PRP lists the COIs with radio nuclides being absent. Monsanto should include radio nuclides as a major component of the risk.

On page 1-1 of the Introduction, second paragraph, Monsanto indicates that elements relative to the future industrial scenario have been deleted from the FS and will be addressed when the plant closes. We prefer to see the contingencies placed in this document, and more than likely be incorporated into the ROD, with the understanding that things do change and the ROD can be amended in the future.

On page 1-2 of the Introduction, first full paragraph, it is noted that the EPA has committed to perform a review of the Stochastic Risk Assessment prior to remedy selection and the ROD. What level of review is proposed? Are there financial provisions (the purchase of software and a set-aside computer) to enable the State to perform a parallel assessment ?

On page 2-2 of the Introduction, Section 1.1, Purpose, it is stated in the first paragraph that remedial alternatives developed must be compatible with plant operations. There will most likely be some changes to Monsanto operating procedures. This might be worded so that the agencies are not bound to accept a remedial alternative that does not interfere with current practices.

On page 1-19, Section 1.4.1.2.1., Solid By-Products, lists by bullet, the by-product piles and their properties. It would be appropriate to list the COIs and their range of concentrations in each of those piles.

On page 1-20, Section 1.4.1.2.2., Liquid By-Products , the first bullet addresses the NPDES discharge for non-contact cooling water. We have resolved that Soda Creek is influenced to a greater degree by Mother Nature than Monsanto's discharge, however, we wish to go on record as indicating that the discharge is permitted for thermal properties only and that introduction of COCs may have a long range impact, which will not be addressed through CERCLA. In accordance with this venue of thought, on page 1-23 of Section 1.4.3, the last paragraph, where no ecological effects have, to date, not occurred, that isn't to say that "stress" on an ecosystem, already stressed by natural processes, can't occur.

On page 1-30, Section 1.5, Previous Remedial Measures, second to the last bullet, Monsanto indicates that past practice has been to place crushed slag on the surface of unused portions of the baghouse dust pile. While this practice has been more effective than no action, we would hope

contained in the second and third paragraphs. Even if there are no current receptors and no anticipated future receptors, we do not feel this is justification for a no-action alternative. The State's support of Monsanto's no-action groundwater alternative, with monitoring, is based on the belief that past remedial activity has already addressed the problem effectively and that time will bear out that supposition. Note: The same argument applies to the wording on Table 3-4.

On page 3-10, Section 3.3.1., On Site Source Materials, the last two paragraphs of the dust-handling-bullet indicate that alternate methods in excavation of the piles could result in reduced fugitive emissions. The argument for addressing the pile, on the leeward side, looks good on paper . In reality, given the shifting wind rose, this is most likely not the case. There are usually difficulties in getting workers to observe and heed changing weather conditions.

On page 3-11, Section 3.3.2., Off-Site Soils arguments for deed restrictions, zoning and ordinances are presented. The State of Idaho has no mechanisms for imposing or enforcing deed restrictions. They must be self-imposed by the PRP(s). There is often difficulty in getting local governments to pass zoning and ordinances and there are currently no provisions to assure those ordinances and zoning restriction remain in tact. The PRP acknowledges in section 4 that the agencies have resisted this option in the past and that this course of pursuit will be difficult.

On page 3-15, Section 3.4.1, On-Site Source Materials, in the second paragraph Monsanto presents their OSHA Four Star argument. Once again we acknowledge that OSHA compliance may be an ARAR, but that does not mean it is protective of Human Health from a risk based perspective.

Same page and section, fifth paragraph. Due to expense, the synthetic membrane option is dismissed. Monsanto may want to reconsider.. Membrane(s) would allow for activity on the site (can be "peeled" back for excavation) and are easily expandable and replaceable. When Monsanto indicates that the option was eliminated, due to expense, it would be of interest to know the dollar value set for rejection of the option (and other options) and other details, such as life-span of the option.

On page 3-15, Section 3.4.1., On-Site Source Materials, the last paragraph indicates the potential problems for the installation of what is presumed to be artificial wind breaks. Did the PRP consider the implementation of natural wind breaks, such as trees? Combinations of artificial and natural wind breaks might have some utility.

On page 3-16, Section 3.4.1., On-Site Source Materials, in the second paragraph it is explained that liners and tarps were eliminated because they were deemed to be less durable. Essentially, this would mean that they would have to be replaced more frequently. There is not sufficient information given to see why this option was eliminated.

In the same section, third paragraph, enclosures were eliminated because of the volume of material involved. Silos have been used at other sites (e.g. . . . J.R. Simplot in Pocatello). Silos

such practices will be evaluated for future use.

On page 2-2, Section 2.1, On-Site Source Materials, first paragraph, data to support the arguments that treater dust, bag-house dust, and roads are minor contributors to risk should be presented. Sometimes combinations of lesser risk drivers, at low cost, are effective approaches to reducing overall risk at a site. Monsanto has not presented sufficient information in this document to enable us to weigh the utility of such an approach.

Same page and section as the last comment, the last paragraph, of the section, presents the argument that UMTRCA as an ARAR will be taken into consideration when the plant is closed. While UMTRCA is an ARAR, it is superceeded by the risk based aspect of the superfund process. Section 2.2, Off-Site Soils, UMTRCA arguments are also invalid for the same reason. (It should be noted that where none of the 0-6" depth soil samples contained radium 226 concentrations, which averaged greater than 6 pCi/g, there were samples in the 0-1" strata which were 17 pCi/g. The UMTRCA standard of 8 pCi/g may not have been violated as an average in the 0-6" strata, but the 0-1" violates the standard. It is in the 0-1" strata that the highest probalities for exposure occur.)

Table 2-1. Preliminary Remediation Goals Based on Human-Health Risk. We acknowledge the text explaining how the numbers on this chart were derived. However, we don't get the same numbers on any constituent present on this table. Please confirm the values on this table. Radio nuclides are conspicuously absent.

Page 3-2, Section 3.1.2., Off-Site Soils, will need to include Radio nuclides.

Page 3-3, Section 3.2, last paragraph in the section, it is indicated that technology types, if not deemed to be implementable, are not evaluated further in the FS. Monsanto has not given us enough information to "buy-in" to the deletions. Case in point . . . on page 3-4 encapsulation was evaluated and rejected as an option that required "enclosures" in excess of 2 acres. A combination of covering what already exists and building a structure to address future activities was not discussed.

On page 3-4, Section 3.2.1., On Site Source Materials, second paragraph presents the argument that the plant is located in an arid climate and that piles would not experience surface water runoff. Southeastern Idaho is noted for its cloudbursts. Inspection of the soil cap on the slag stands as a testimonial. . .

Page 3-5, Section 3.2.2., Off-Site Soils, first paragraph discusses GRAs and technology types. This approach will be altered when Radio nuclides are factored in.

Page 3-6, Section 3.2.3., Groundwater, second and third paragraphs. While we have no objection to Monitoring groundwater, as proposed by Monsanto, we object to the language

usually allow for ongoing operations and are cost effective over the long term. Once again, it would be helpful to see Monsanto's detailed rationale for elimination of this option.

On page 3-16, Section 3.4.2., Off-Site Soils, the third paragraph in the section indicates that a RCRA Subtitle C landfills were eliminated because offsite soils would not characterize as hazardous. While this is true for the metals, what of the radio nuclides?

On page 3-17, Section 3.4.2., Off-Site Soils, in the last paragraph in the section it is argued that in-situ vitrification was cost prohibitive and that some of the COIs would be volatilized by the process. The first part of the argument is understandable, however, hoods are used to capture vapors and the vapors are scrubbed. The second part of the argument is, therefore, flawed.

On Table 3-2, does encapsulation include, by definition, the construction of silos or quonsets?

The same table should have a footnote to indicate that dust controls include water supression, chemical application, gravel armor, wind breaks, material handling procedures, etc.

On Table 3-6 Precious metals extraction was listed as a General Response Action. This GRA was not discussed in the text. We would be interested in the arguments presented for eliminating this as a possible alternative.

On Figure 3-1 target clean up levels are listed. Please verify these numbers. Once again, the absence of radio nuclides is conspicuous.

On page 4-3, Section 4.2, Alternative 1 - No Action With Monitoring, Monsanto proposed that only the COIs, that exceed MCLs, should be monitored in the future. We feel there is value in tracking the other constituents of interest.

On page 4-4, Section 4.2.3., Cost, the cost of the ground water monitoring alternative is listed as $572,000 for the estimated 10-year present worth. This number looks high. Please verify.

On page 4-8, Section 4.5.2., Implementability. Radio nuclides will be an important component of risk. This alternative should be evaluated with the expanded scope of the radio nuclide issue.

On page , Section 4.7, Alternative 6, crop loss compensation was included in the evaluation. Isn't most of the land in the CRP? We would ask Monsanto justify their figures for this alternative.

General Comments:

There appear to be a number of options, and combination of options, that Monsanto has not weighed. We would like to have seen more detail, and rationale, as to why certain options were deleted and others retained.

We suspect, the addition of the radio nuclide component will have a significant impact on this document, and that Monsanto will need to generate another draft.